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*Attorneys for Defendant*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION

BITCO GENERAL INSURANCE  
CORPORATION,

Plaintiff,

vs.

J. BURNS BROWN CO.,

Defendant.

CV-18-87-GF-BMM-JTJ

**AFFIDAVIT OF SANDRA BROWN**

I, SANDRA BROWN, being duly sworn, hereby swear that the following is true and correct:

1. I am the owner of J. BURNS BROWN OPERATING COMPANY, (JBBOC) and as such am familiar with all business activities including the cleanup of the pollution that was discovered in March 2017.

2. BITCO paid JBBOC \$100,000 for pollution cleanup costs. I requested additional payment under BITCO's umbrella policy. In response, BITCO mailed the Complaint for Declaratory Judgment and asked me to accept service.

3. The total cleanup costs were in excess of \$1.3M in May 2019. I anticipate additional costs because additional work must be done including taking down the dike that was built to control the spill.

4. JBBOC does not have the financial resources to pay the contractor who did the work to contain the spill and clean up the pollution. Thus, JBBOC currently owes the contractor in excess of \$1.2M. If the contractor agrees to do the additional work, the amount owed will increase.

FURTHER YOUR AFFIANT sayeth not.

I swear under penalty of perjury that the foregoing is true and correct.

  
SANDRA BROWN

SUBSCRIBED AND SWORN TO before me this 12<sup>TH</sup> day of July, 2019.

COUNTY OF HILL  
STATE OF MONTANA



